Before the
Federal Communications Commission
Washington, DC 20554

In the matter of	)	
	)	
Additional Spectrum for Federal, State,	)	
And Local Emergency Response Providers	)	WT Docket No. 05-157
In the 700 Mhz Band, and	)	
	)	
The Operation and Administration of a	)	
Nationwide Interoperable Broadband	)	
Mobile Communications Network	)	

Reply Comments of Captain Sonya L. Owens
Metropolitan Police Department

I hereby submit the following reply comment, not as the representative of the agency, but in response to the Federal Communications Commission Public Notice FCC 05-80 consideration of allocating additional portions of the electromagnetic spectrum for Federal, State, and local emergency response providers, if granted by Congress, in the 700 MHz band and; regarding the operation and administration of a potential nationwide interoperable broadband mobile communications network, and; consideration of the use of commercial wireless technologies to the greatest extent practicable.

The future needs of emergency response providers will require national interoperability of broadband mobile communications, along with the ability to grow with future developments in wireless technologies fueled by both public sector and commercial entities. The term “emergency response provider” has grown beyond its traditional inclusion of law enforcement, emergency medical services, fire and emergency management agencies. It has begun to adopt “part-time” emergency response providers such as school administrators, infrastructure providers and the Citizen Corps. In doing so, a national communications network should be capable of handling increased information management and information technology demands throughout the life cycle of incidents and from all participating groups.

Commercial entities have already begun to test and build the WiMax infrastructure. Land based access points should be reasonably developed and technology implemented by the end of 2005. In 2007, WiMax will be available on cellular telephones. Overall, wireless broadband technology presents an excellent opportunity to expand 9-1-1 capabilities. Imagine for a moment, the benefit of being able to automatically download AMBER Alerts, terrorists' warnings, severe weather alerts, as well as other public service announcements. The pictures of missing children, escapees, and the FBI's Top Ten Most Wanted could be made available through a subscription service. The money earned from monthly subscriptions would pay for the cost of services. WiMax can be used as a very capable crime deterrent. For example, police officers would better obtain criminal history and motor vehicle records through wireless devices, without leaving their areas - untethered from buildings or patrol vehicles. It might also expand the use of traffic radar, photo radar and processing crime scenes (forensics).

The administration of the Broadband Mobile Communications Network can be centralized under one agency such as the Department of Homeland Security or regionalized similar to the Federal Reserve Banks or the US Court of Appeals. Some of the benefits of regional administration are: Adequate representation of local factors, potential mirroring of distance ranges used by the hardware components, and an ongoing consensus group would help determine national operations, training, and equipment standards. The need for emergency response providers to obtain authorization to access the network during multiple incidents would be dispersed regionally and would allow for proper monitoring. In addition, pursuant to the National Incident Management System (NIMS), authorization and utilization of the National Broadband Mobile Communications Network might occur within the Unified Area Command or the Joint Information Centers. Operation of the Broadband Communications Network would be handled by licensed Wireless Internet Service Providers (WISPs).

I am not able to discuss in great detail at this time, the intricacies related to identifying specific frequency bands or the amount of spectrum needed. However, it appears that the

allocation of 24 MHz in the Upper 700 MHZ for public safety services and its subsequent breakdown, is a proper beginning for the Broadband Mobile Communications Network: 12.5 MHz for General Use; 2.6 Mhz for Interoperability; 2.4 MHz for State Licenses: 0.3 MHz for Low Power Operations; 0.2 Mhz for Secondary Trunking; and 6.0 MHz for Reserve. Some of the bandwidth for General Use should be allocated specifically for hospitals' communication, NIMS and additional Low Power Operations.

Respectfully Submitted by,

Captain Sonya L. Owens
Assistant District Commander
Metropolitan Police Department – Fifth District
1805 Bladensburg Road, NE
Washington, DC 20002